

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Birim Group, LLC, a California Limited)
Liability Company, Assignee,)
)
Plaintiff,) Case No. 20-cv-7198
)
v.) Honorable Thomas R. Durkin
)
Paa Kwesi Nduom, a.k.a Dr. Paa Kwesi Nduom,)
Papa Kwesi Nduom, Kwesi P. Nduom, an)
Individual, et al.,)
)
Defendants.)

CERTAIN DEFENDANTS' MOTION TO DISMISS

Paa Kwesi Nduom, GN Bank, an Illinois Federally-Chartered Financial Institution, International Business Solutions, LLC, Groupe Nduom USA, LLC, GN Money, LLC, Yvonne Nduom, Nana Kweku Nduom, Edjah Nduom, Nana Aba Nduom, Robert Klamp, James L. Buckner, Lisa Finch, Francis Baffuor, William C. Goodall, and Donald Davidson, by their undersigned counsel, hereby move this Court pursuant to Fed. R. Civ. P. 12(b)(6), for entry of an order dismissing Plaintiff Birim Group's complaint.

The bases for this motion are more fully set forth in the accompanying Memorandum in Support.

Respectfully Submitted,

**Dr. Papa Kwesi Nduom,
GN Bank, an Illinois Federally-Chartered
Financial Institution,
International Business Solutions, LLC,
Groupe Nduom USA, LLC
GN Money, LLC,
Yvonne Nduom,
Nana Kweku Nduom,
Edjah Nduom,
Nana Aba Nduom,**

**Robert Klamp,
James L. Buckner,
Lisa Finch,
Francis Baffuor,
William C. Goodall, and
Donald Davidson**

By: /s/ Ricardo Meza
One of their Counsel

Ricardo Meza (Atty. No. 6202784)
Meza Law
161 N. Clark Street, Suite 1600
Chicago, IL 60601
(312) 802-0336
rmeza@meza.law

Robert M. Andalman (Atty. No. 6209454)
Rachael Blackburn (Atty. No. 6277142)
A&G Law LLC
542 S. Dearborn St.; 10th Floor
Chicago, IL 60605
Tel.: (312) 341-3900
Fax: (312) 341-0700

CERTIFICATE OF SERVICE

I, Ricardo Meza, an attorney, hereby certify that the foregoing **CERTAIN DEFENDANTS' MOTION TO DISMISS** was electronically filed on April 5, 2021 and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

/s/ Ricardo Meza

Ricardo Meza